

LeClairRyan

A Professional Corporation

One Riverfront Plaza
1037 Raymond Boulevard
Sixteenth Floor
Newark, NJ 07102
(973) 491-3600

Attorneys for Plaintiff, Ramada Worldwide Inc.

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

RAMADA WORLDWIDE INC., a Delaware
Corporation,

Plaintiff,
v.

INN AT THE WICKLIFFE, LLC, an Ohio
limited liability company; MEETA SHETH,
an individual; and GHANSHYAM PATEL,
an individual,

Defendants.

Civil Action No. 15-cv-3975 (WHW)(CLW)

REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT MEETA SHETH ONLY PURSUANT TO FED. R. CIV. P. 55(a)

**TO: CLERK OF THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY.**

YOU WILL PLEASE ENTER the default of defendant **Meeta Sheth only** for failure to
plead or otherwise defend as provided by the Federal Rules of Civil Procedure.

LeClairRyan
Attorneys for Plaintiff,
Ramada Worldwide Inc.

By: _____
Bryan P. Couch

Dated: September 18, 2015

LeClairRyan
A Professional Corporation

One Riverfront Plaza
1037 Raymond Boulevard
Sixteenth Floor
Newark, NJ 07102
(973) 491-3600
Attorneys for Plaintiff, Ramada Worldwide Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RAMADA WORLDWIDE INC., a Delaware Corporation,

Plaintiff,
v.

INN AT THE WICKLIFFE, LLC, an Ohio limited liability company; MEETA SHETH, an individual; and GHANSHYAM PATEL, an individual,

Defendants.

Civil Action No. 15-cv-3975 (WHW)(CLW)

**CERTIFICATION OF BRYAN P.
COUCH IN SUPPORT OF REQUEST
FOR ENTRY OF DEFAULT AGAINST
DEFENDANT MEETA SHETH ONLY
PURSUANT TO FED. R. CIV. P. 55(a)**

BRYAN P. COUCH, of full age, hereby certifies and states:

1. I am an attorney-at-law of the State of New Jersey and a shareholder of the law firm of LeClairRyan, attorneys for plaintiff, Ramada Worldwide Inc. ("RWI"), in the above-captioned matter. As such, I have personal knowledge of the facts contained herein.

2. I make this certification in support of RWI's application for the entry of default against defendant Meeta Sheth ("Defendant") only pursuant to Federal Rule of Civil Procedure 55(a).

3. On June 15, 2015, we forwarded the Summons and Complaint to Recon Management Group ("Recon") to effectuate personal service upon Defendant.

4. Despite diligent efforts and inquiry, Recon has been unable to locate defendant Meeta Sheth. See Affidavit of Diligent Efforts attached hereto as Exhibit A.

5. By letter dated July 21, 2015, a true copy of which is attached hereto as Exhibit B, RWI served Defendant with a copy of the Summons and Complaint via regular and certified mail, return receipt requested pursuant to Fed R. Civ. P. 4(e)(1).

6. I have not heard from the Defendant and to my knowledge no filing was made with the Court under Local Civ. R. 6.1(b).

7. The time in which Defendant may answer or otherwise respond to the aforementioned Complaint has expired and has not been further extended or enlarged by the Court, and Defendants have not answered or otherwise moved.

8. Accordingly, this request is being made for the entry of default against Defendant in the above-captioned matter.

I certify under penalty of perjury that the foregoing is true and correct.



Bryan P. Couch

Executed on: September 28, 2015
Newark, New Jersey

EXHIBIT A

Case 2:15-cv-03975-WHW-CLW Document 4 Filed 06/15/15 Page 1 of 2 PageID: 134

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

RAMADA WORLDWIDE INC.,
Plaintiff

V.

SUMMONS IN A CIVIL CASE

INN AT THE WICKLIFFE, LLC, ET AL.,
Defendant

CASE
NUMBER: 2:15-CV-03975-WHW-CLW

TO: (Name and address of Defendant): **MEETA SHETH**

2793 Enclave Bay Dr.
Chattanooga TN 37415

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) -- or 60 days if you are the United States or a United States Agency, or an office or employee of the United States described in Fed. R. civ. P. 12 (a)(2) or (3) -- you must serve on the plaintiff an answer to the attached complaint or a motion under rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

WILLIAM T. WALSH

CLERK

MARIA F. GARCIA

(By) DEPUTY CLERK



ISSUED ON 2015-06-15 13:56:23, Clerk
USDC NJD

Affidavit of Diligent Efforts as to Meeta Sheth

Re: Ramada Worldwide, Inc. v. Inn at the Wickliffe, LLC et al.

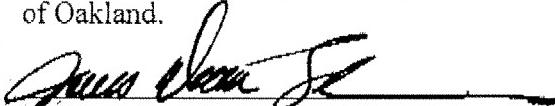
1. Affiant, William H. Narro, is an employee of RECON Management Group, LLC and is an attorney licensed in the State of Michigan and makes this affidavit on information and belief on 7-14-2015.
2. Affiant proceeded with preliminary research to locate a viable current address for Defendant on 6-16-15
3. Based on the research and data received and processed, as well as, client-supplied data, we forwarded the summons and complaint on Defendant to TN server on 6-18-15 (Defendant traced to an address at 2793 Enclave Bay Dr. Chattanooga TN 37415).
- 4) TN server reported on 7-9-15 that Defendant was not personally served at 2793 Enclave Bay Dr. Chattanooga TN 37415 as server was unable to locate Defendant at the locations after numerous attempts on 6-25, 6-26, and twice on 7-8-15. Defendant, Meeta Sheth, has resided continuously at 2793 Enclave Bay Dr. Chattanooga TN 37415 since 2007
- 5) We have no further alternative location information for this Defendant after diligent inquiry and attempts and assert that the address listed as the principal's residential address at 2793 Enclave Bay Dr. Chattanooga TN 37415 is the last known address associated with Defendant and we believe Defendant, through its agents, employees or relatives is attempting to evade service in this matter.

Dated: 7-14-15

William H. Narro, J.D.
RECON Management Group
30400 Telegraph Rd. #472
Bingham Farms MI 48025
248-540-0160

Subscribed to and sworn before

me on 7/14/15
In the State of Michigan County
of Oakland.



Notary Public

JAMES DEAN SCHENCK
NOTARY PUBLIC, STATE OF MICH.
COUNTY OF MACOMB
MY COMMISSION EXPIRES Jan. 12, 2018
ACTING IN THE COUNTY OF Oakland

Case 2:15-cv-03975-WHW-CLW Document 4 Filed 06/15/15 Page 2 of 2 PageID: 135

RETURN OF SERVICE		
Service of the Summons and complaint was made by me (I)	DATE	
NAME OF SERVER (PRINT) <u>DENIS BAKKEM</u>	TITLE <u>Process Server</u>	
Check one box below to indicate appropriate method of service		
<input type="checkbox"/> Served personally upon the defendant. Place where served: <u>2793 Enclave Br 7 Dr.</u> <u>Chattanooga TN 37415</u>		
<input type="checkbox"/> Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.		
<input type="checkbox"/> Name of person with whom the summons and complaint were left:		
<input checked="" type="checkbox"/> Returned unexecuted: <u>Attempts made 6/25/15 @ 10:00AM, 6/26/15 @ 7:15PM,</u> <u>7/8/15 9:08 AM, 7/8/15 @ 6:30 PM. - No answer at the</u> <u>door.</u>		
<input type="checkbox"/> Other (specify): 		
STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.		
Executed on <u>7/9/15</u>	Date	<u>Denis Bakkem</u> Signature of Server
<u>P.O. Box 17446, Chattanooga, TN 37415</u> Address of Server		

EXHIBIT B



July 21, 2015

VIA REGULAR AND CERTIFIED MAIL

Meeta Sheth
2793 Enclave Bay Dr.
Chattanooga, TN 37415

Re: Ramada Worldwide Inc. v. Inn at the Wickliffe, LLC, et al.
Civil Action No. 15-cv-3975

Dear Sir or Madam:

Enclosed for service upon you is a Summons and Complaint filed against Defendants, Inn at the Wickliffe, LLC, Meeta Sheth and Ghanshyam Patel, in the United States District Court for the District of New Jersey. Please be guided accordingly.

Very truly yours,

A handwritten signature in black ink that appears to read "Bryan P. Couch".

Bryan P. Couch
Attorney at Law

BPC:sem
Enclosure

E-mail: Bryan.Couch@leclairryan.com
Direct Phone: (973) 491-3582
Direct Fax: (973) 491-3632

1037 Raymond Boulevard, Sixteenth Floor
Newark, New Jersey 07102
Phone: 973.491.3600 | Fax: 973.491.3555

CALIFORNIA | COLORADO | CONNECTICUT | MARYLAND | MASSACHUSETTS | MICHIGAN | NEW JERSEY | NEW YORK | PENNSYLVANIA | VIRGINIA | WASHINGTON, D.C.